

Aidala, Bertuna & Kamins, P.C.

ARTHUR L. AIDALA*
 MARIANNE E. BERTUNA*
 HON. BARRY KAMINS (RET.)
 HON. JOHN M. LEVENTHAL (RET.)
 JOHN S. ESPOSITO
 MICHAEL T. JACCARINO
 IMRAN H. ANSARI
 DIANA FABI SAMSON**
 ANDREA M. ARRIGO*
 MICHAEL F. DIBENEDETTO*
 LINO J. DE MASI
 DAVID M. SCHWARTZ+

*ALSO ADMITTED IN NEW JERSEY
 **ALSO ADMITTED IN CONNECTICUT
 +ALSO ADMITTED IN D.C.

546 FIFTH AVENUE
 NEW YORK, NY 10036
 TELEPHONE: (212) 486-0011
 FACSIMILE: (917) 261-4832
 WWW.AIDALALAW.COM

8118 - 13TH AVENUE
 BROOKLYN, NEW YORK 11228
 TEL: (718) 238-9898
 FAX: (718) 921-3292

OF COUNSEL
 JOSEPH A. BARATTA
 ANTOINETTE LANTERI
 WILLIAM R. SANTO
 PETER S. THOMAS
 LAWRENCE SPASOJEVICH
 SIGURD SORENSON

SENIOR COUNSEL
 LOUIS R. AIDALA
 JOSEPH P. BARATTA

BY ECF

Honorable Eric R. Komitee
 United States District Judge Eastern District of New York
 225 Cadman Plaza East, Courtroom: 6G North
 Brooklyn, New York 11201

Re: *Edmondson, et al. v. Raniere et al.*, 1:20-CV-00485-EK-CLP

Dear Judge Komitee:

We are newly retained counsel for Defendant Clare Bronfman (“Bronfman”) in the above-referenced matter. We write the Court to respectfully request a reasonable enlargement of the page length of our brief in support of a Motion to Dismiss Plaintiffs’ Third Amended Complaint (“TAC”) filed on June 6, 2023, and for an extension of time to file said Motion to Dismiss. Specifically, we respectfully request that the Court extend the current deadline for Bronfman to file her Motion to Dismiss from June 28, 2023, to July 28, 2023, and that we be permitted to file a brief of twenty-five (25) pages.

We have conferred with Counsel for the Plaintiffs, and while they have consented to Bronfman’s request for an extension of time to file her motion, they have not consented to Bronfman’s request that she be permitted to file a brief with a page limit of twenty-five pages.¹ There have been no previous requests by Bronfman for this relief.

We ask that the Court grant both requests for the following reasons. With respect to our request for a thirty-day extension of time to file our brief, we request this because of the complexities of the claims, the multitude of parties, and extensive factual allegations in the TAC. This extension is needed to allow our firm to familiarize ourselves with the current state of litigation, give the TAC the careful consideration it requires, and confer with our client - a process which, due to her incarceration, presents a logistical hurdle, and is often not as expeditious as preferred. Given the current order of the Court, which limits Bronfman’s briefing to 10 pages, responding only to those portions of the pleading that were not already addressed in the prior briefing, we have already asked for and received a redlined version of the TAC so we

¹ On June 5, 2023, the Court granted Plaintiff’s Motion to file a Third Amended Complaint and ordered that defendants may if they wish supplement their argument in furtherance of their pending motions to dismiss in briefs limited to addressing Plaintiffs’ latest amendments not exceeding ten pages by June 28, 2023.

can accurately identify the content that was added and/or amended. Notably, the TAC is vastly different from the Second Amended Complaint, which is the reason for our request that we be permitted to file a brief of twenty-five pages in length.

Due to the substantial changes to the complaint (a fact that Plaintiffs' counsel has expressly acknowledged themselves in email correspondence), we feel that the 10-page limitation on our motion to dismiss the TAC is insufficient. Particularly so for our client, who forewent filing opposition papers to the motion for leave to amend the TAC (Doc. 202), and thereby conserved time and resources for all parties, and the Court. As our client did not submit a brief in opposition to the filing of the TAC, in anticipation of focusing her briefing on a motion to dismiss the TAC, her brief will not be supplemental to any previous briefing addressed to the TAC, unlike other Defendants. We therefore respectfully request that Bronfman be permitted to file a brief of twenty-five pages and that the deadline to do so be extended to July 28, 2023.

Respectfully Submitted,

/s/ Imran H. Ansari
Imran H. Ansari